

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

**PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,**

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND
UNDER SEAL PURSUANT TO
31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: State of Texas
c/o Attorney General of Texas Ken Paxton
Office of the Attorney General of Texas
209 West 14th St.
Austin, Texas 78701

Relator Alex Doe has filed a *qui tam* lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 *et seq.*, the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 *et seq.*, and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 *et seq.*

A copy of the complaint is attached hereto and is served on the State of Texas pursuant to 31 U.S.C. § 3732(c), Rule 4 of the Federal Rules of Civil Procedure, and Texas Human Resources Code § 36.102.

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Rd. South, Suite 250
Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator,

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator,

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

**PLANNED PARENTHOOD
FEDERATION OF AMERICA, INC.,
PLANNED PARENTHOOD GULF
COAST, INC., PLANNED
PARENTHOOD OF GREATER
TEXAS, INC., PLANNED
PLANNED PARENTHOOD SOUTH
TEXAS, INC., PLANNED
PARENTHOOD CAMERON
COUNTY, INC., PLANNED
PARENTHOOD SAN ANTONIO,
INC.,**

Defendants.

Civil Action No. 2-21CV-022-Z

FILED IN CAMERA AND
UNDER SEAL PURSUANT TO
31 U.S.C. § 3730(b)

DO NOT ENTER INTO PACER

SUMMONS IN A CIVIL ACTION

To: State of Louisiana
c/o Attorney General of Louisiana Jeff Landry
Office of the Attorney General of Louisiana
1885 North Third Street
Baton Rouge, Louisiana 78702

Relator Alex Doe has filed a *qui tam* lawsuit on behalf of the United States of America, the State of Texas, and the State of Louisiana, against defendants Planned Parenthood Federation of America, Inc., Planned Parenthood Gulf Coast, Inc.,

Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc., for treble damages and civil penalties pursuant to the False Claims Act, 31 U.S.C. §§ 3729 *et seq.*, the Texas Medicaid Fraud Prevention Act, Tex. Hum. Res. Code §§ 36.001 *et seq.*, and the Louisiana Medical Assistance Programs Integrity Law, La. Rev. Stat. §§ 46:437.1 *et seq.*

A copy of the complaint is attached hereto and served on the State of Louisiana pursuant to 31 U.S.C. § 3732(c), Rule 4 of the Federal Rules of Civil Procedure, and Louisiana Revised Statutes § 46.439.2(A).

Pursuant to 31 U.S.C. § 3730(b)(2) the complaint has been filed in camera and shall remain under seal for at least 60 days and shall not be served on the defendants until the court so orders.

Pursuant to 31 U.S.C. § 3730(b)(2)-(4), within 60 days after service of this summons and complaint on you, the government must either elect to intervene and proceed with the action, notify the court that the government declines to take over the action, or move the court for an extension of time during which the complaint remains under seal.

You must file your response with the court in camera and under seal and serve the relator's attorneys whose names and address are:

Andrew B. Stephens
Heather G. Hacker
Hacker Stephens LLP
108 Wild Basin Rd. South, Suite 250
Austin, Texas 78746

Date: March 2, 2021



CLERK OF COURT

/s/ D. Aguilera, Deputy Clerk